

DECLARATION OF JOHN VICKERS

I, John Vickers, declare:

1. This declaration is based upon my personal knowledge and if called upon to testify as to the matters stated herein, I could and would competently do so.
2. In the months following our father's death, besides grieving, my brother and I focused our energy on winding down his affairs and transitioning his obligations to us, along with tending to our own families and obligations.
3. Like my brother – the FVT's process that was unfolding was completely foreign to us. The general climate was one of uncertainty and suspicion. Of particular concern to us was what, if any, impact filing a claim through the FVT process would have on our insurance claim and we wanted to get that squared away before we took any other action as we certainly did not want to jeopardize the insurance claim.
4. Over time, we became more familiar with the process and what remedies were available to us, and therefore more comfortable with filing a proof of claim.
5. Our father suffered a dramatic decline in his health in the weeks following the Camp Fire (see narratives attached, which we believe hastened his death.
6. Certainly, given the proximity of my father's death to the Camp Fire and that the FVT's claim process had not yet been initiated, filing a proof of claim to preserve his emotional distress claims (both zone of danger and nuisance) was temporally impossible. It would be grossly unjust if his emotional distress claims were disallowed because the process the FVT created to redress them did not yet exist.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge.

Executed this 6 day of May 2022 at Boise, Idaho.

DocuSigned by:

JOHN VICKERS